

Exhibit H

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

KIMBERLY COLLINS,
Plaintiff,

v.

CHARLESTON PLACE, LLC,
d/b/a BELMOND CHARLESTON PLACE,
Defendant.

) C. A. NO: 2:15-CV-4465-PMD-BM
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AFFIDAVIT OF SHAWN CRAWFORD

1. My name is Shawn Crawford, and I am a citizen of the United States and a resident of South Carolina. I am over the age of eighteen years, of sound mind, and capable of making this Affidavit. The statements contained herein are true and correct based upon my personal knowledge.

2. I am currently employed as the Director of Security for Belmond Charleston Place. I was in this position at all times relevant to Kimberly Collins's lawsuit. I am an African-American male.

3. I was present in the hotel's employee cafeteria, along with Carol Etheridge and Leon Scott, on April 13, 2015, when Ms. Collins entered the cafeteria at approximately 2:00 p.m.

4. Ms. Collins confronted Mr. Scott about an e-mail he had sent earlier that afternoon regarding the Black Lives Matter protest in the hotel's Palmetto Café. Ms. Collins yelled something to the effect of: "I can't believe you sent that e-mail about the protestors being respectful!"

5. Ms. Collins's tone was extremely disrespectful towards Mr. Scott, and she accused him of inappropriately "comping" a room for Al Sharpton.

6. Ms. Collins turned to Ms. Etheridge and pointed her finger at Ms. Etheridge and said, "You, Miss Regional HR Director," and began to yell at Ms. Etheridge for an employee training session that had occurred more than three months earlier.

7. Both Mr. Scott and Ms. Etheridge urged Ms. Collins to calm down, but Ms. Collins refused and continued to yell.

8. Ms. Collins's behavior in the employee cafeteria was disrespectful, aggressive, and inappropriate. Ms. Collins was very angry. I could see Ms. Collins's dislike and even hate in the conversation.

9. At one point, Ms. Collins walked away, but then turned around and yelled, "I'm so sick of all of this. Our country is in the worst place it's ever been." At the end of her tirade, Ms. Collins yelled, "I know I'll be fired, but I don't care."

10. I did not say anything in response to Ms. Collins's tirade in the employee cafeteria. Mr. Scott's tone was calm, but stern, towards Ms. Collins. Ms. Etheridge's tone was calm, and there was no anger in her voice. Neither Mr. Scott nor Ms. Etheridge raised their voices during the incident.

11. I have read this statement consisting of two (2) pages, and it is true and correct based on my personal knowledge.

FURTHER AFFIANT SAYETH NOT.

Shawn Crawford
Shawn Crawford

Signed and sworn to before me this 5 day of January, 2017.

Kendall Jones
Notary Public for the State of South Carolina

My Commission Expires: 07/28/2025

